

STATE OF COLORADO

Bill Owens, Governor
Jane E. Norton, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

HAZARDOUS MATERIALS AND WASTE MANAGEMENT DIVISION

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Colorado Department
of Public Health
and Environment

February 9, 2001

Joseph Legare, Assistant Manager
Environment & Infrastructure
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Dyan Foss
Kaiser-Hill, L.L.C.
Rocky Flats Environmental Technology Site
10808 Highway 93, B130
Golden, CO 80403-8200

RE: Comments on Final Draft of the Building 371/374 Decommissioning Operations Plan (DOP)

Dear Ms. Foss and Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the "Division") has reviewed the *Building 371/374 Closure Project Decommissioning Operations Plan (DOP)*, Final Draft dated December 20, 2000. The Building 371/374 DOP describes how decommissioning activities will be performed for Type 2 and Type 3 facilities within the Building 371/374 Closure Project at the Rocky Flats Environmental Technology Site (RFETS). Overall, the Division has found the 371/374 DOP to be a well-written document that does not require many significant changes. The Division has prepared a list of comments and questions related to the 371/374 DOP, which are attached and were sent to RFETS via e-mail on February 8, 2001. If you have any questions or would like to discuss these comments, please contact James Hindman at (303) 692-3345.

Sincerely,

Steven H. Gunderson
RFCA Project Coordinator

James A. Hindman
Building 371/374 Closure Project Coordinator

Attachment

cc: F. Gerdeman, DOE-RFFO
D. Shelton, Kaiser-Hill
J. Stevens, Kaiser-Hill
T. Rehder, EPA Region VIII

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DOCUMENT CLASSIFICATION
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ADMIN RECORD

371-A-000019

COMMENTS ON THE B371/374 DOP – FINAL DRAFT (DATED 12/20/00)

1. References to the Building 374 typing need to be revised to reflect the decision that it is a Type 3 facility.
2. Section 2.1 (10th bullet), Section 4.4.2 (2nd paragraph), Section 4.4.3 (2nd paragraph), Section 4.4.3.7: Per RFCA, deactivation only applies to the removal of SNM. Some decommissioning activities are allowed to occur under the DPP prior to receiving an approved RFCA Decision Document.
3. Footnote “a” to Table 1: Why is a new cooling tower being constructed? Where will it be located? Will it be decommissioned under this DOP?
4. Section 4.2.2 (last paragraph): Describe in detail the isolation controls and postings that have been implemented to prevent contamination for each Type 1 facility.
5. Table 3: Describe the scope of activities planned for dismantlement sets numbered 27 and 28.
6. Is the B371/374 Closure Project planning to remove any interior walls, floors, ceilings, or other building structural components within the scope of any of the dismantlement sets or decommissioning areas? If so, please specify in which sets/areas these activities will occur.
7. Figure 7: The figure seems to incorrectly show that process area operations are clean prior to performing structural area decontamination and surveys of process areas. The figure seems to incorrectly show that plenum area operations are clean prior to performing structural decontamination and surveys of plenum areas. Additionally, the figure shows that sprinkler systems will be discontinued while at the same time the figure shows that sprinklers will be reduced 50%. Please resolve these apparent discrepancies. Also, describe what is meant by a 50 % reduction in sprinklers, HEPA testing, and housekeeping.
8. Section 4.0: The last two sentences of this section needs to be revised to state, “In such cases, planned activities may be revised without revising the CPB consistent with RFCA and the DPP. Notable changes will be shared with the LRA”
9. Section 4.4: The last sentence of the first paragraph of this section needs to be amended to state, “. . . as long as the activity remains within the scope of the *RSOP for Facility Component Removal, Size Reduction and Decontamination Activities*, and consistent with RFCA and the DPP, this DOP will not be modified.”
10. Section 4.4.1, (7th paragraph from the end of section): The potential for release of contamination from open ductwork must also be considered when the open

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ductwork will remain connected to the ventilation system (especially, the possibility of the ventilation system going down must be considered).

11. Section 4.4.1, (5th paragraph from the end of section): Specify the safety analysis and radiation protection thresholds that will allow plenums to be removed.
12. Section 4.4.2: The 6th bullet under the second paragraph of this section indicates that I/O stations will be dismantled prior to the decontamination of the structure. However, the second to the last paragraph of this section states, "The I/O stations will be decontaminated when the CSV is decontaminated." Please resolve this apparent discrepancy.
13. Section 4.4.2 (5th paragraph): Describe what is meant by the phrase, "... the man-lift will be covered"
14. Section 4.4.2 (4th paragraph, 5th paragraph, 7th paragraph, 8th paragraph, and last paragraph): There are several instances where it is stated that materials and equipment will be removed and managed as either TRU waste or LL waste. Since the CSV is a RCRA permitted unit, all material and equipment removed from the CSV must be adequately characterized for possible RCRA contamination.
15. Section 4.4.2 (5th paragraph): Describe how the adapters will be installed for the fogging activities. Will it be necessary to breach the CSV structure? How will releases of contamination from the CSV be released during the installation of the adapters.
16. Section 4.4.3 (3rd paragraph): The first sentence of this paragraph states that mechanical and process equipment will be managed as TRU or LL waste. This seems to be inconsistent with what is stated in the previous paragraph (that this equipment will be managed as TRU or TRM waste). A hazardous waste determination must be made for all waste removed.
17. Sections 4.4.3.1, 4.4.3.2, and 4.4.3.5: The document states that Room 2327 is moderately contaminated and will be stripped out as LL waste. An adequate hazardous waste determination must be made for all wastes removed. Additionally, since there were known releases of acidic hazardous wastes, the cement floors in the Incinerator Scrubber Canyon, in the Precipitation/Calcination Canyon, and at least the localized etched areas and splash areas on the floor and walls in the Residue Ion Exchange Canyons should be sampled for radiological and chemical (RCRA) contamination or be removed and managed as mixed waste.
18. Section 4.4.5.1: The first and third bullets in this section seem to be inconsistent. The first bullet describes the first step to prepare equipment for the centralized size reduction facility and states that the equipment will be decontaminated. The third bullet states that the third step will be to fix contamination on the equipment.

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19. Section 4.4.5.2: Information needs to be added to this section to describe ventilation and any other controls for preventing air releases of contamination when In Situ Size Reduction is being conducted in soft-sided containment.
20. Section 4.4.6: The second paragraph of this section mentions a schedule for Dismantlement Sets. Schedules need to be included for information purposes for the Dismantlement Sets and the Decommissioning Areas.
21. Section 4.4.6, Step 4: Describe what is meant by the phrase "sub-surface paint sampling." Additionally, removed paint debris must be subjected to an adequate hazardous waste determination to see if it is possibly TRM waste.
22. Section 4.4.7, Step 7: Describe how the depth of contamination will be determined for contaminated surfaces.
23. Section 4.5: The last sentence of the first paragraph of this section needs to be amended to state, "As long as the activity remains within the scope of the *RSOP for Facility Disposition*, and consistent with RFCA and the DPP, this DOP will not be modified."
24. Section 4.5: Language needs to be added stating that a Demolition Plan will be prepared and executed in accordance with the *RSOP for Facility Disposition*. Additional language needs to be added stating that air emissions control (including the preparation of a Dust Control Plan) and air monitoring will be planned and executed for demolition activities in accordance with the *RSOP for Facility Disposition*.
25. Section 4.5: The complete characterization and subsequent management of the Under Building Contamination (UBC) sites associated with Buildings 371 and 374 must be described in the DOP.
26. Section 4.5: Language must be added to clearly state that demolition of the building will not occur until it meets free-release standards.
27. Section 4.5.2: Describe how wastewater generated from demolition dust control activities will be collected, contained, managed and disposed.
28. Section 4.5.4: Describe how the Type 2 tanks will be characterized for radiological contamination. The DOP needs to describe how containment structures for these tanks will be adequately characterized for radiological and chemical contamination. Additionally, describe how the tanks and containment structures will be managed if they do not meet the acceptable criteria for recycling. The DOP needs to describe how the soils beneath the Type 2 tanks and associated containment structures will be characterized before back-filling and

grading activities occur. The DOP needs to describe the management of any contaminated soils encountered.

29. Section 4.5.5: This section assumes that large tanks from Building 374 will be allowed to remain in place until demolition. However, it is possible that the tanks will need to be removed earlier in order to address under-building contamination. This section should describe how such a scenario would be managed.

Additionally, describe how portions of the building that are below the ground surface (e.g., Room 2804 in Building 374) will be managed during the demolition phase. How will precipitation be managed after the roof is removed from these areas? Does RFETS intend to backfill these areas?

Describe the rationale for abandoning the underground duct banks at the Building 371 Electrical Switch Yard. Do these duct banks have any lead sheathing?

30. Section 4.5.6, Step 5: The Division is not convinced that the rubble pile resulting from the collapse of the main portion of Building 371 will be "... fairly flat and uniform, and free of large voids." Thus, it is not appropriate to propose that the pile will be left as is with some surficial back filling as proposed.
31. Section 5: Have all waste chemicals been removed from the Exclusion Areas? If not, the DOP must describe how these remaining waste chemicals will be managed and disposed of.
32. Section 5.1.1: The last sentence of this section must be corrected to refer to idle equipment rather than mixed residue tanks.
33. Section 5.2: The reference to 6 CCR 1007-3, Part 264.1(g)(6) is incorrect. Generator Treatment provisions are found under 6 CCR 1007-3, Section 100.21(d).
34. Section 10: The DOP does not satisfy the notification requirements for the referenced RSOPs. Notification of the implementation of the RSOPs must follow the notification requirements specified in the respective RSOP.
35. Section 11.1: The Building 371/374 Closure Project AR file also includes all other documents referenced in the *RSOP for Facility Disposition* and in the *RSOP for Facility Component Removal, Size Reduction and Decontamination Activities*, and all related correspondence.